

# Exhibit 7

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 STEVEN E. GREER, MD  
5 an individual,

6 Plaintiff,

7 -against-

8 Dennis Mehiel, an individual, Robert  
9 Serpico, an individual, The Battery Park  
10 City Authority, a New York State authority,  
11 Howard Milstein, an individual, Steven  
12 Rossi, an individual, Janet Martin, an  
13 individual, Milford Management, a New York  
14 Corporation, and Mariners Cove Site B  
15 Associates, a New York corporation.

16 Defendants.

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24 CONFIDENTIAL  
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26 DEPOSITION OF ROBERT MICHAEL SERPICO  
27 New York, New York  
28 March 21, 2017  
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36 Reported by:  
37 Pessi Goldstein  
38 JOB NO. 121382  
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March 21, 2017

10:27 a.m.

DEPOSITION of ROBERT MICHAEL SERPICO,  
a Defendant herein, held at the United  
States District Court, Southern District of  
New York, 500 Pearl Street, New York, NY  
10007, taken before Pessi Goldstein, a  
shorthand reporter and Notary Public within  
and for the State of New York.

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A P P E A R A N C E S:

STEVEN E. GREER, MD  
Plaintiff Pro Se

SHER TREMONTE  
Attorneys for Defendants  
Robert Michael Serpico  
Battery Park City Authority  
80 Broad Street  
New York, NY 10004  
BY: MICHAEL TREMONTE, ESQ.  
MICHAEL GIBALDI, ESQ.

ROSENBERG & ESTIS  
Attorneys for  
Remaining Defendants  
733 Third Avenue  
New York, NY 10017  
BY: DEBORAH RIEGEL, ESQ.

ALSO PRESENT:

ALIX S. PUSTILNIK  
General Counsel for BPCA

\* \* \*

## S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND  
AGREED by and between the attorneys for the  
respective parties herein, that filing,  
sealing and certification be and the same  
are hereby waived.

IT IS FURTHER STIPULATED AND  
AGREED that all objections, except as to the  
form of the question shall be reserved to  
the time of the trial.

IT IS FURTHER STIPULATED AND  
AGREED that the within deposition may be  
signed before any Notary Public with the  
same force and effect as if signed and sworn  
to before the Court.

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2 so the notion that it was ruled not  
3 permissible by discovery is completely  
4 impossible. This is a new document  
5 that just arose.

6 Okay. So, we'll take that up  
7 with the judge, okay.

8 Q. Now, have you ever had personal  
9 meetings with Steve Rossi in the  
10 neighborhood, in the nature of coffee, let's  
11 grab coffee, that sort of thing?

12 MR. TREMONTE: Objection to form.

13 A. Yes.

14 Q. How many times in the last three  
15 years do you estimate you've met Steve Rossi  
16 in person?

17 A. I don't know a count but I would  
18 average, on an average maybe once every four  
19 months or so, thereabouts, sometimes it was  
20 back-to-back, then we wouldn't see each  
21 other for months. I would say average about  
22 once every four months or so.

23 Q. And those meetings have been  
24 going on for how many decades?

25 MR. TREMONTE: Objection.

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2 A. Steve and I know each other for a  
3 long time so we have been meeting regularly  
4 for a long time, decades, I don't know if it  
5 goes back to the '80s but --

6 Q. Were you present --

7 MR. TREMONTE: Please let the  
8 witness finish his testimony.

9 Q. Was he present for your 2016  
10 going away party at Pier A?

11 MR. TREMONTE: Objection to form.

12 A. I don't remember seeing him. If  
13 he showed up, it was for a brief moment but  
14 I don't remember seeing him that night.  
15 Maybe he was, I couldn't, I forget, I don't  
16 know.

17 Q. Did you take a photograph with  
18 him with your arm around him?

19 MR. TREMONTE: Objection.

20 A. If he was there, chances are,  
21 yes.

22 MR. TREMONTE: Hold on, you've  
23 got to let me make my objection. You  
24 are getting perilously close to being  
25 beyond the scope of permissible

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2 actual nitty-gritty making a decision, there  
3 were some concerns internally.

4 Q. And what were those concerns?

5 A. The concerns, my understanding of  
6 the concerns internally were that you were  
7 abusive to intern staffs and you were  
8 intimidating and you were using bad language  
9 and ad hominem attacks and you were abusing  
10 staff when you called in and didn't get the  
11 answers you want. So that was a concern I  
12 know internally and that may have fostered  
13 the decision.

14 Q. Do you have any voicemail or  
15 audio recordings of that alleged behavior of  
16 mine?

17 MR. TREMONTE: Objection to form.

18 A. No, but I have firsthand  
19 knowledge, I mean Seema Singh, I work  
20 closely with her, she was senior counsel,  
21 and Seema Singh was acting general counsel  
22 at one point. And right after she got off  
23 the phone with you, I was with her and she  
24 was visibly upset because you had called her  
25 a word I won't even use, in language, but it



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2 began with a C and end with a T, and it was  
3 extremely disparaging and extremely  
4 upsetting to her as a female attorney and  
5 that was typical of language used with other  
6 staff at the Authority so --

7 Q. And this is based on testimony  
8 but you don't have any --

9 A. Right, when she hung up the phone  
10 she was visibly upset, yes.

11 MR. TREMONTE: Hold on, hold on.

12 Objection, number one, you have to let  
13 the witness answer the question you put  
14 to him. And number two, to the extent  
15 that you are making comments that are  
16 not questions about his testimony, I  
17 would move to strike those as  
18 superfluous and harassing.

19 Q. On July 29 of 2015, you had a  
20 public board meeting. I was once again not  
21 allowed in and I was sent to what I best,  
22 they described as a video overflow room down  
23 at 21 West Thames or where the old PEP  
24 offices were. Are you aware of, when I use  
25 the word "video overflow room," and so